

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS HATFIELD TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T16-17)

The United States Postal Service hereby provides the response of witness Hatfield to the following interrogatory of United Parcel Service: UPS/USPS-T16-17, filed on August 6, 1997.

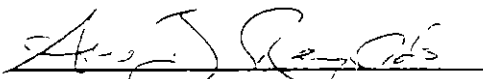
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

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August 20, 1997

RESPONSE OF U.S. POSTAL SERVICE WITNESS HATFIELD
TO INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-T16-17. Please refer to page 16, lines 8 and 9, of your testimony.

(a) Does commercial air transportation move Parcel Post mail between facilities that are within the service area of a processing and distribution center? Please explain your answer.

(b) Does commercial air transportation move Parcel Post mail between facilities that are within the service area of a BMC? Please explain your answer.

(c) If your answer is yes to either (a) or (b) above, please provide:

- (i) Specific descriptions of all routings; and
- (ii) The commercial air test year transportation costs for the routings.

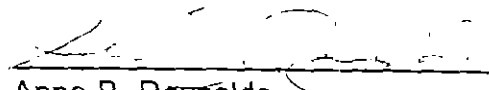
RESPONSE:

(a)-(b) In general, commercial air is not used to transport Parcel Post. In the few instances where Parcel Post may travel on air transportation, these instances will most likely not be between facilities that are within the service area of a processing and distribution center or a BMC. It is my understanding that the geographic areas covered by these facilities are typically not large enough to necessitate air transportation between facilities within that area.

(c) N/A

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anne B. Reynolds

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